



Graves Garrett LLC

Edward D. Greim  
Direct Dial: (816) 256-4144  
[edgreim@gravesgarrett.com](mailto:edgreim@gravesgarrett.com)

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VIA ECF

Hon. Debra Freeman  
Daniel Patrick Moynihan  
United States Courthouse  
Courtroom 17A  
500 Pearl Street  
New York, New York 10007

**Re:** Eastern Profit Corp. Ltd. v. Strategic Vision US, LLC, Case No. 18-cv-2185 (JGK)-DCF  
Motion to Compel Disclosure against Strategic Vision US, LLC

Dear Judge Freeman:

This letter replies to Eastern Profit's opposition (ECF 203) to Strategic's motion to compel ACA Capital Group Limited to appear for testimony and produce documents (ECF 197).

Eastern's short response does not explain how it will be burdened by requiring ACA to appear and provide testimony and documents. Nor does it deny the facts we have learned so far about Golden Spring (New York)'s contact with Karin Maistrello to discuss "something" about the subpoena immediately before she purported to resign from ACA, just one day before service. Finally, it does not respond to Strategic's argument that ACA was properly served under controlling New York and Hong Kong law.

Rather, Eastern's counsel tries to walk back its witness's crystal-clear and game-changing testimony from just a few weeks ago. Eastern's corporate representative revealed for the first time that [REDACTED] Eastern Tr. 46:22-47:14. Further, Eastern claimed for the first time that [REDACTED]

Eastern Tr. 73:20-74:8. Eastern says

Eastern Tr. 196:9-15. Eastern specifically

admitted that

Eastern Tr. 202:2-203:24. However, Eastern refused to testify, as "beyond the scope," about [REDACTED] Tr. 204:21-24. Finally, Eastern [REDACTED]

Tr. 208:7-16.



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That the CCP is able to use the legal process and court system on the Mainland and Hong Kong to effectuate its goals is irrelevant—no one has ever claimed that in either jurisdiction, the CCP freezes assets on its own action without using legal process (such as it is) or through extra-governmental means. The key point is that a true enemy of the CCP would never compile assets in either the Mainland or Hong Kong, and then expect to freely send money to and from those locations for allegedly dissident activities. And, as Strategic showed in its last letter, Guo's lawyer and spokesperson claimed as much in a public statement to the Wall Street Journal and other outlets disputing Strategic Vision's counterclaim in July 2019, asserting that Guo had never moved a penny from Hong Kong since he began speaking out as a dissident. We now know that is false: Guo had ACA send money to Strategic; ACA sent money to a prominent witness in this case; and ACA funded Guo's own asylum lawyers.

ACA is the link to the CCP, and its attempt to dodge this forum should be rejected.

Respectfully submitted,

A handwritten signature in black ink that appears to read "Edward D. Greim".

Edward D. Greim  
Attorneys for Defendant/Counterclaimant